

GREENBERG TRAUIG LLP

Mark G. Tratos (Bar No. 1086) (*Local Counsel*)
 F. Christopher Austin (Bar No. 6559) (*Local Counsel*)
 Ronald D. Green, Jr. (Bar No. 7360) (*Local Counsel*)
 3773 Howard Hughes Parkway, Ste. 500 North
 Las Vegas, Nevada 89169
 Tel: (702) 792-3773
 Fax: (702) 792-9002

KRONENBERGER BURGOYNE, LLP

Karl S. Kronenberger (CA Bar No. 226112) (*Pro Hac Vice*)
 150 Post Street, Suite #520
 San Francisco, CA 94018-4707
 Tel: (415) 955-1155
 Fax: (415) 955-1158
 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**ST. MATTHEW'S UNIVERSITY
 (CAYMAN) LTD., a Cayman Islands
 company,**

Plaintiff,

vs.

**SABA UNIVERSITY SCHOOL OF
 MEDICINE FOUNDATION, a Netherland-
 Antilles company; MEDICAL
 UNIVERSITY OF THE AMERICAS, a St.
 Kitts & Nevis company; EDUCATION
 INFORMATION CONSULTANTS, INC., a
 Massachusetts corporation;
 EDUCATIONAL INTERNATIONAL
 CONSULTANTS, LLC, a Massachusetts
 limited liability company; PATRICIA L.
 HOUGH, M.D. an individual, and d.b.a.
 "Saba University School of Medicine";
 DAVID L. FREDRICK, an individual;
 PANKAJ DESAI, M.D., an individual;
 ASSOCIATION OF AMERICAN
 INTERNATIONAL MEDICAL
 GRADUATES, INC., a Nevada
 corporation, a.k.a. "aaimg@yahoo.com";
 THOMAS MOORE, M.D. a.k.a.
 "presaaimg@hotmail.com" and
 "crocdoc2004@netzero.net," an
 individual; SARAH B. WEINSTEIN a.k.a.
 "execsecaaimg@hotmail.com," an
 individual; RACHAEL E. SILVER, an
 individual; and DIEDRE MOORE, an
 individual,**

Defendants.

Case No. 2:05-CV-00848-BES-LRL

**JOINT MOTION TO EXTEND STAY OF
 ALL PROCEEDINGS**

GREENBERG TRAUIG, LLP
 3773 Howard Hughes Parkway, Suite 500 North
 Las Vegas, Nevada 89169
 (702) 792-3773
 (702) 792-9002 (fax)

1 Plaintiff in the above-captioned matter, St. Matthew's University (Cayman), Ltd.
 2 ("SMU"), and appearing defendants Saba University School of Medicine Foundation ("Saba
 3 University"); the Association of American Medical School Graduates, Inc. ("AAIMG"),
 4 Education Information Consultants, Inc. ("EIC, INC."); Educational International
 5 Consultants, LLC ("EIC, LLC"), David L. Fredrick, Patricia L. Hough, M.D., and Pankaj
 6 Desai, M.D. (the "Appearing Defendants"), (together, the "Parties"), hereby jointly request
 7 this Court to extend its previous order staying all actions in light of pending settlement
 8 discussions, until and including February 2, 2007, in accordance with the form of proposed
 9 order submitted herewith. In support of this motion, the Parties respectfully represent as
 10 follows:

11 1. SMU filed the within action in the United States District Court for the District of
 12 Nevada captioned St. Matthew's University (Cayman) Ltd v. SABA University School of
 13 Medicine Foundation et al, Civil Action No. CV-S-05-0848-RCJ(LRL) (the "Litigation"), and
 14 have been actively engaged in the prosecution of the claims and defenses presented in the
 15 Litigation since the inception of this matter;

16 2. The Parties have determined that it is their mutual best interest to engage in
 17 good faith settlement discussions with the goal of finally resolving and settling, once and for
 18 all, and all of the claims and defenses presented in the Litigation on terms that are fair and
 19 just to all Parties;

20 3. In furtherance of this goal, the Parties wish to avoid the substantial cost and
 21 expense associated with continuing with this Litigation during the time that the Parties will
 22 be actively engaged in good faith settlement discussions;

23 4. The Parties represent that they have entered into a written standstill
 24 agreement pursuant to the terms of which each party to this Litigation has agreed, subject
 25 to this Court's approval, to suspend all further activities in connection with the prosecution
 26 or defense of this matter, including, without limitation, the filing of any motions, discovery,
 27 subpoena or service upon or the addition any Parties to the Litigation;

28 /

1 5. The Parties have additionally agreed agree that they will not commence or
2 prosecute, or cause to be commenced or prosecuted, any new or existing litigation
3 between any of the Parties in any jurisdiction prior to the termination date of any stay
4 entered by the Court in this matter;

5 6. The Parties have been actively engaged in good faith discussions regarding a
6 resolution of this matter during the stay ordered by the Court and have made substantial
7 progress toward a resolution of this matter. The Parties respectfully represent that an
8 extension of the stay until February 2, 2007 will afford the Parties the additional time
9 needed to conclude their discussions;

10 7. The Parties further represent that no party to this Litigation will be prejudiced
11 by the requested stay, and that the requested stay will serve the interests of conserving
12 judicial resources.

13 WHEREFORE, the Parties respectfully request that this Court enter an order
14 extending the previous stay to and including February 2, 2007 upon the terms and
15 conditions reflected in the attached proposed form of Order.

16 Respectfully Submitted,

17 Dated: Jan. 12, 2007

GREENBERG TRAURIG, LLP

By: 

Mark G. Tratos, Esq.

F. Christopher Austin, Esq.

Ronald D. Green, Jr., Esq.

GREENBERG TRAURIG, LLP

3773 Howard Hughes Parkway, Ste. 500 N

Las Vegas, Nevada 89109

Tel: 702-792-3773

Counsel for Plaintiff ST. MATTHEW'S UNIVERSITY
(CAYMAN), LTD.

GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway, Suite 500 North
Las Vegas, Nevada 89169
(702) 792-3773
(702) 792-9002 (fax)

1 Dated: 1/11, 2007

ALVERSON TAYLOR MORTENSEN & SANDERS

2 By:



3 Bruce A. Alverson, Esq.

4 Nathan Reinmiller, Esq.

ALVERSON TAYLOR MORTENSEN & SANDERS

7401 West Charleston Blvd.

Las Vegas, Nevada 89117

Tel.: 702-384-7000

Counsel for Defendants

ASSOCIATION OF AMERICAN INTERNATIONAL
MEDICAL GRADUATES, INC., SABA UNIVERSITY

SCHOOL OF MEDICINE FOUNDATION, LTD.,

MEDICAL UNIVERSITY OF THE AMERICAS,

EDUCATION INFORMATION CONSULTANTS, INC.,

EDUCATIONAL INTERNATIONAL CONSULTANTS,

LLC, PATRICIA L. HOUGH, M.D., DAVID L. FREDRICK,

and PANKAJ DESAI, M.D.

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